

## REMARKS

As a preliminary matter, Applicants thank the Examiner for the acknowledgement of allowable subject matter in claim 15. Claim 15 has thus been rewritten in independent form herein, and the Examiner should now find the claim in condition for immediate allowance, which is respectfully requested.

Claims 14 and 16-18 still stand rejected under 35 U.S.C. 103(a) as being unpatentable over Serbutoviez et al. (U.S. 6,306,469) in view of Matsuyama et al. (U.S. 5,969,781). Applicants therefore again respectfully traverse this rejection for at least the reasons of record, and as follows. A *prima facie* case of obvious has not been established. Neither of the cited references, alone or in combination, teaches or suggests all of the recited features of independent claim 14, and the rejection still does not cite any affirmative teaching or suggestion to make the proposed combination.

As previously discussed, Section 2143.03 requires that the Examiner be able to cite to where the prior art references teach or suggest each and every feature and limitation of the claimed invention. In the present case, however, this requirement still has not been met, and the actual language of the claims does not appear to have been given full or proper consideration. Nowhere to the references describe, nor has the Examiner actually asserted that the references describe, that liquid crystal molecules are tilted utilizing differences in the response speed of the liquid crystal. This particular limitation from the claim still does not appear to have actually been considered.

The Examiner admits that Serbutoviez fails to teach or suggest anything regarding the response speed of the liquid crystal, and still relies only upon Matsuyama for supplying the relevant subject matter. The subject matter relied upon by the Examiner from Matsuyama, however, is irrelevant to the actual limitations at issue from claim 14. The Examiner has never asserted more than the fact that the speed of response may vary according to the tilt angle of the liquid crystal molecules. Claim 14 though, recites the opposite relationship.

Claim 14 is, after all, is a method claim, and not an apparatus claim. The claim does not merely feature that the tilt angle and the response speed are related, as the Examiner appears to assert. Instead, claim 14 defines a process step where the molecules are tilted utilizing the response speed differences in the liquid crystal, which is just the opposite of what the Examiner has asserted, namely, that the response speed differences are based on the tilt angles of the liquid crystal.

In other words, the Examiner asserts that the response speed varies based on preexisting tilt angles, whereas claim 14 defines that the tilt angles are set based on preexisting response speeds. The two concepts are not equivalent. The relationship alleged by the Examiner sets the two parameters in a dependency that is exactly the opposite of that featured in claim 14. In a method claim, the ordering of the relationship between recited elements is an additional limitation that the Examiner is required to consider. Because this particular limitation from claim 14 has never been given full consideration, the rejection should again be withdrawn for at least these reasons.

The rejection should also be withdrawn because it still fails to cite one single teaching or suggestion from either prior art reference that would motivate one of ordinary skill in the art to make the proposed combination. The only rationale that has been submitted on the record is the broad statement that one “skilled in the art would be motivated for achieving a desirable view angle characteristic.” Applicants will stipulate that a “desirable view angle characteristic” is a goal of practically every device and/or method in this particular field of art. This basic goal though, by itself, simply fails to justify why these two particular prior art references can or should be combined. The Examiner must be able to cite to where the prior art teaches the particular *combination*, and not merely a broad and basic goal stated by one of the references. Because the Examiner has never provided any such evidence on the record to support the actual combination proposed, the rejection is still deficient on its face for at least these reasons, and again should be withdrawn.

Applicants further note that the outstanding Advisory Action (November 27, 2006) fails to even challenge these arguments relating to the rejection’s failure to justify the combination. Because the Examiner has a burden to answer all meritorious arguments before repeating a rejection, the rejection should be withdrawn for at least these reasons as well.

Lastly, in an effort to expedite prosecution only, Applicants have further amended claim 14 herein to even better emphasize the clear differences between the prior art and the present invention discussed above. The Examiner can see that claim 14 now more clearly features that the different pre-tilt angles are imparted to the liquid crystal molecules with respect to a surface of the substrates. Matsuyama cannot read upon such features.

As cited by the Examiner, Fig. 6B of Matsuyama, along with its accompanying text, clearly illustrates and describes that “the molecules 3a and 3b *tilt by the same angle relative to the substrate.*” (Col. 4, lines 65-67). Matsuyama therefore teaches exactly the opposite of what is featured in the present invention, and the outstanding rejection is further inappropriate for at least these reasons as well.

This particular portion of Matsuyama also further demonstrates how the present invention could not be obvious from the proposed combination. Matsuyama clearly establishes a uniform tilt angle to the molecules in the region around the pixel electrode 7 by making the strengths of the electric fields E1, E3 the same on either side of the electrode. (Figs. 3, 6B; col. 4, lines 65-67). In contrast, according to the present invention, the pre-tilt of the molecules is different in parts of the pixel region, which is not taught or suggested by Matsuyama. Therefore, for these still further reasons, the rejection should be withdrawn.

For all of the foregoing reasons, Applicants submit that this Application, including claims 14-18, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

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Respectfully submitted,

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